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Opposition Due:
June 3, 2015

*Attorneys for Plaintiffs Moore Macro Fund, LP,
Moore Macro Markets Fund (Master), LP,
SJL Moore, Ltd., JR Moore, LP, LM Moore LP,
MF Moore LP (formerly Moore Global Fixed
Income Fund (Master) LP), Moore Global Investments,
Ltd., Moore Emerging Markets Fund (Master) LP,
Moore Capital Advisors, L.L.C., and Trade Process Corporation*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>IN RE:</p> <p>LEHMAN BROTHERS HOLDINGS INC., et al.,</p> <p><i>Debtors.</i></p>	<p>CHAPTER 11</p> <p>CASE NO. 08-13555 (SCC)</p>
<p>MOORE MACRO FUND, LP, MOORE MACRO MARKETS FUND (MASTER), LP, SJL MOORE, LTD., JR MOORE, LP, LM MOORE LP, MF MOORE LP (formerly MOORE GLOBAL FIXED INCOME FUND (MASTER) LP), MOORE GLOBAL INVESTMENTS, LTD., MOORE EMERGING MARKETS FUND (MASTER) LP, MOORE CAPITAL ADVISORS, L.L.C., and TRADE PROCESS CORPORATION,</p> <p><i>Plaintiffs,</i></p> <p><i>-against-</i></p> <p>LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS SPECIAL FINANCING INC., and LEHMAN BROTHERS COMMERCIAL CORPORATION,</p> <p><i>Defendants.</i></p>	<p>ADVERSARY PROCEEDING NO: 14-02021 (SCC)</p> <p>NOTICE OF MOTION TO COMPEL</p> <p><u>Hearing:</u> June 9, 2015 <u>Time:</u> 10:00 a.m. <u>Place:</u> Courtroom 623</p>

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, and the Declaration of Erik S. Groothuis, dated May 26, 2015, and exhibits thereto, Plaintiffs Moore Macro Fund, LP, Moore Macro Markets Fund (Master), LP, SJL Moore, Ltd., JR Moore, LP, LM Moore LP, MF Moore LP (formerly Moore Global Fixed Income Fund (Master) LP), Moore Global Investments, Ltd., Moore Emerging Markets Fund (Master) LP, Moore Capital Advisors, L.L.C., and Trade Process Corporation will move before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York located at One Bowling Green, New York, New York, Courtroom 623, at 10:00 a.m. on June 9, 2015, for an order, pursuant to Fed. R. Civ. P. 37(a), made applicable to this proceeding by Bankruptcy Rule 7037, compelling Defendants Lehman Brothers Holdings, Inc., Lehman Brothers Special Financing Inc., and Lehman Brothers Commercial Corporation to produce documents responsive to the Plaintiffs' First Request for Production of Documents, Items No. 4 and No. 5, and to the Plaintiffs' Second Request for Production of Documents, Item No. 1.

PLEASE TAKE FURTHER NOTICE that any opposition shall be filed and served so as to be received by Plaintiffs' counsel no later than June 3, 2015, and any reply shall be filed and served so as to be received by Defendants' counsel no later than June 8, 2015.

Dated: New York, New York
May 26, 2015

Respectfully submitted,

SCHLAM STONE & DOLAN LLP

By: /s/

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